

EXHIBIT B

RICHARD L. ENGSTROM, Ph.D.

April 19, 2006

Page 121

1 conclusion that a white voter is more likely to
2 support a black African-American, nonincumbent
3 candidate than a Latino voter is?

4 MS. COHEN: Objection.

5 Q (By Ms. Ross:) More likely?

6 A. In absolute terms, in terms of absolute
7 level of support.

8 Q. Doesn't your analysis also support the
9 conclusion that a white voter is more likely to
10 support a Latino, nonincumbent candidate than is an
11 African-American voter?

12 MS. COHEN: Objection.

13 THE WITNESS: In terms of the absolute
14 level of support, yes.

15 Q (By Ms. Ross:) In your opinion, are black
16 voters and Latino voters, taken together as a group,
17 politically cohesive?

18 MS. COHEN: Objection.

19 THE WITNESS: Blacks and Latinos as a
20 group?

21 Q (By Ms. Ross:) Yes.

22 A. I would not say they're politically
23 cohesive based on my numbers.

24 Q. You testified in the black political -- in

CATUOGNO COURT REPORTING SERVICES

Springfield, MA Worcester, MA Boston, MA Lawrence, MA Providence, RI

RICHARD L. ENGSTROM, Ph.D.

April 19, 2006

Page 152

1 people are a member of a particular group will
2 provide an opportunity to elect?

3 A. It can be the case that the number would
4 not be a sufficient provider of reasonable
5 opportunities.

6 Q. What is the so-called, much maligned
7 "65 percent rule" of the 1990s?

8 MS. COHEN: Objection. I see we're
9 getting into legal stand.

10 THE WITNESS: I don't know about the
11 65 percent rule of the 1990s. But the
12 65 percent rule began -- a lot of people think
13 of it now as a safe district. It began as a
14 50-50 type of district.

15 The 65 percent was if you had 65 percent
16 total population and you could assume about 60
17 percent voting age population, you could assume
18 about 55 percent registration and with turnout
19 differentials you may be at a 50-50 electorate
20 on election day. That was the source of the
21 65 percent notion.

22
23 (Off the record.)
24

CATUOGNO COURT REPORTING SERVICES

Springfield, MA Worcester, MA Boston, MA Lawrence, MA Providence, RI